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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

Plaintiff,

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INFORMATION

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FERNANDO PARRA,

Defendant.

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Cause No. EP-06-CR-1369FM-9

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE (18 U.S.C. §§ 1349, 1346, AND 1341) CONSPIRACY TO COMMIT MAIL FRAUD, WIRE FRAUD AND THE DEPRIVATION OF HONEST SERVICES

Beginning on or about September 1, 2003, and continuing through and including on or about July 6, 2007, in the Western District of Texas and elsewhere, defendant,

FERNANDO PARRA,

conspired and agreed together with others known, but not charged herein, and others unknown, to commit offenses against the United States, that is to knowingly devise a scheme and artifice to defraud the County of El Paso and the citizens of the County of El Paso of the right to the honest services of elected members of the El Paso County Commissioner's Court and an elected County Official in the affairs of El Paso County; and conspired to knowingly devise a scheme to obtain money and property by means of material false and fraudulent pretenses, representations and promises; that is, the defendant and others agreed to pay money, both cash and in the form of

political contributions, to elected members of the El Paso County Commissioner's Court and to the elected County Official, and said members of the El Paso County Commissioner's Court agreed to receive cash and political contributions, and said elected county official agreed to accept cash, trips and payment of debts, in exchange for their support and vote in their official capacity as members of the El Paso County Commissioner's Court and as an elected County official, in violation of their fiduciary duty as elected members of the El Paso County Commissioner's Court and as an elected County official, for a contract between El Paso County and a vendor seeking business with El Paso County; and in furtherance of the scheme to deprive the County of El Paso and its citizens of the honest services of the elected members of the El Paso County Commissioner's Court and of an elected County official, and to obtain money and property by material false and fraudulent pretenses, representations and promises the defendant and his uncharged co-defendants sent and caused to be sent and delivered, by the United States Postal Service and by commercial interstate carrier, bid proposals and other correspondence required to be sent to the County for consideration for contracts entered into between El Paso County and potential vendors, all in violation of Title 18, United States

Respectfully submitted, JOHNNY SUTTON

UNITED STATES ATTORNEY

By:

Code, Sections 1349, 1346, and 1341.

Debra P. Kanof

Assistant U.S. Attorney